

EXHIBIT F

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5 -and-

6 Marshall S. Turner (*pro hac vice*)
CONDON & FORSYTH LLP
7 7 Times Square
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8 Telephone: (212) 490-9100
Facsimile: (212) 370-4453
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10 Attorneys for Plaintiff and Counter-Defendant
ALL NIPPON AIRWAYS COMPANY, LTD.

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA

14 ALL NIPPON AIRWAYS COMPANY,)
LTD.,)
15 Plaintiff,)
16 vs.)
17 UNITED AIR LINES, INC.,)
18 Defendant.)

Case No.: C07-03422 EDL

**SECOND AMENDED
NOTICE OF DEPOSITION OF
SCOTT M. RUSSELL**

19 AND RELATED COUNTERCLAIM
20

21 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD IN THIS
22 ACTION:

23 YOU ARE HEREBY NOTIFIED THAT pursuant to Federal Rule of Civil
24 Procedure 30, All Nippon Airways Company, Ltd. ("ANA"), by its attorneys
25 Condon & Forsyth LLP, will take the deposition of Scott M. Russell at Combs
26 Reporting, Inc., 595 Market Street, Suite 620, San Francisco, California 94105, on
27 January 23, 2008, commencing at 9:30 a.m.

28 ANA may record the testimony by videotape, in addition to recording the

1 testimony by stenographic method. ANA reserves the right to use the videotaped
2 deposition of Scott M. Russell at trial.

3 PLEASE TAKE FURTHER NOTICE that the witness shall bring with him
4 to the deposition and produce no later than 9:00 a.m. on the day of the deposition
5 all original documents identified in Schedule "A" attached to this notice.
6

7 Dated: December 28, 2007

CONDON & FORSYTH LLP

8
9 By: 

10 MARSHALL S. TURNER (*pro hac vice*)

11 SCOTT D. CUNNINGHAM

12 Attorneys for Plaintiff and Counter-Defendant
13 ALL NIPPON AIRWAYS COMPANY, LTD.
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SCHEDULE "A"

The term "DOCUMENTS" as used herein means writings of every kind and character including correspondence, transcripts, summaries, notes, letters, memoranda, opinions, reports, tabulations, statements, photographs, drawings, charts, graphs, models, information stored in or generated by computer programs, bulletins, books, schedules, compilations, lists, worksheets, records of any communications, conversations or conferences, telegrams, appointment books, calendars, diaries, audio or video tape recordings, manuals, ledgers and journals. It is requested that all such documents be brought with the deponent, whether or not the deponent or any party will claim that any such document is protected from discovery by the attorney/client privilege or work product rule. The use of the term "DOCUMENTS" includes the original of such writings and any copies which bear notations or information in addition to that contained in the original. A DOCUMENT is deemed to be in custody or control of the witness if such witness has a right to secure the DOCUMENT or a copy thereof from any person or any public or private entity having actual physical possession thereof.

DOCUMENTS TO BE PRODUCED

1. The entire contents of the deponent's file concerning the subject accident which took place on October 7, 2003 at San Francisco International Airport.

2. Any and all DOCUMENTS regarding the subject flight and accident and the investigation thereof.

3. The deponent's personnel records, including but not limited to DOCUMENTS pertaining to any aircraft accident or incident involving the deponent and any disciplinary action against the deponent.

4. The deponent's licenses, certificates, and other DOCUMENTS related to the deponent's operation of aircraft or aircraft components.

5. The deponent's training materials and records, including but not limited to DOCUMENTS concerning (i) clearing potential conflicts with other aircraft prior

1 to or during taxi; (ii) clearing potential conflicts with other aircraft prior to or during
2 pushback; (iii) conflict resolution; (iv) wing growth; (v) aircraft taxiing; and (vi)
3 determination of Pilot Flying.

4 6. Any and all DOCUMENTS reflecting UAL's policies, procedures, and
5 operations in effect on October 7, 2003 concerning (i) clearing potential conflicts
6 with other aircraft prior to or during taxi; (ii) clearing potential conflicts with other
7 aircraft prior to or during pushback; (iii) conflict resolution; (iv) wing growth; (v)
8 aircraft taxiing; and (vi) determination of Pilot Flying.

9 7. Any and all DOCUMENTS reflecting UAL's policies, procedures, and
10 operations currently in effect concerning (i) clearing potential conflicts with other
11 aircraft prior to or during taxi; (ii) clearing potential conflicts with other aircraft prior
12 to or during pushback; (iii) conflict resolution; (iv) wing growth; (v) aircraft taxiing;
13 and (vi) determination of Pilot Flying.

14 8. A complete copy of the UAL operations manual in effect on October 7,
15 2003 and applicable to the UAL aircraft involved in the collision between ANA
16 Flight NH007 and UAL Flight UA809 at San Francisco International Airport
17 ("SFO") on October 7, 2003 (the "Accident").

18 9. A complete copy of the current UAL operations manual applicable to its
19 B777 aircraft at the present time.

20 10. Any and all DOCUMENTS which UAL and/or its flight crew was
21 required to have on board Flight UA809 at the time of the Accident.

22 11. Any and all DOCUMENTS regarding pushback and taxi operations of
23 UAL B777 aircraft into and out of SFO in effect at the time of the Accident.

24 12. Any and all DOCUMENTS regarding pushback and taxi operations of
25 UAL B777 aircraft into and out of SFO in effect at the present time.

26 13. Any and all DOCUMENTS reflecting the requested and/or assigned
27 routing for Flight UA809 on October 7, 2003.
28

1 14. A complete copy of all Jeppesen charts applicable to ground operations
2 of UAL B777 aircraft at SFO in effect at the time of the Accident.

3 15. A complete copy of all Jeppesen charts applicable to ground operations
4 of UAL B777 aircraft at SFO in effect at present.

5 16. A complete copy of all charts applicable to ground operations of Flight
6 UA809 at SFO in effect at the time of the Accident.

7 17. Any and all DOCUMENTS reflecting dispatch for Flight UA809 on
8 October 7, 2003, including but not limited to (i) flight plan; and (ii) assigned altitude.

9 18. Any and all DOCUMENTS reflecting procedures used during the
10 pushback operation of Flight UA809 on October 7, 2003.

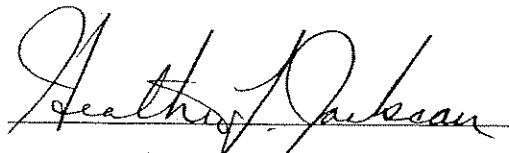
11 19. Any and all DOCUMENTS reflecting changes in procedures used
12 during pushback operations of UAL B777 aircraft after October 7, 2003.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing **PLAINTIFF ALL NIPPON AIRWAYS SECOND AMENDED NOTICE OF DEPOSITION OF SCOTT M. RUSSELL** was mailed this 28th day of December, 2007, to:

Scott R. Torpey, Esq. Jaffe, Raitt, Heuer & Weiss 2777 Franklin Road, Suite 2500 Southfield, MI 48034-8214 Phone: (248) 727-1461 Fax: (248) 351-3082	Attorneys for defendant
Jeffrey A. Worthe, Esq. Worthe, Hanson & Worthe The Xerox Centre 1851 East First Street, Ninth Floor Santa Ana, CA 92705	Attorneys for defendant

in a properly addressed wrapper in an official depository under the exclusive care and custody of the United States Post Office Department within the State of New York.


HEATHER L. JACKSON

Sworn to before me this
 28th day of December, 2007


 Notary Public

Timothy H Eskridge
Notary Public State of N.Y.
 02ES6121835
Qualified in New York County
Commission Expires January 31 2009

1 Scott D. Cunningham (State Bar No.: 200413)
CONDON & FORSYTH LLP
2 1901 Avenue of the Stars, Suite 850
Los Angeles, California 90067-6010
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6 Marshall S. Turner (*pro hac vice*)
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7 7 Times Square
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Facsimile: (212) 370-4453
9 Email: mturner@condonlaw.com

10 Attorneys for Plaintiff and Counter-Defendant
ALL NIPPON AIRWAYS COMPANY, LTD.

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA

14 ALL NIPPON AIRWAYS COMPANY,)
LTD.,)

15 Plaintiff,

16 vs.

17 UNITED AIR LINES, INC.,)

18 Defendant.)

Case No.: C07-03422 EDL

**SECOND AMENDED
NOTICE OF DEPOSITION OF
JOHN REDIGER**

19 AND RELATED COUNTERCLAIM
20

21 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD IN THIS
22 ACTION:

23 YOU ARE HEREBY NOTIFIED THAT pursuant to Federal Rule of Civil
24 Procedure 30, All Nippon Airways Company, Ltd. ("ANA"), by its attorneys
25 Condon & Forsyth LLP, will take the deposition of John Rediger at Combs
26 Reporting, Inc., 595 Market Street, Suite 620, San Francisco, California 94105, on
27 January 24, 2008, commencing at 9:30 a.m.

28 ANA may record the testimony by videotape, in addition to recording the

1 testimony by stenographic method. ANA reserves the right to use the videotaped
2 deposition of John Rediger at trial.

3 PLEASE TAKE FURTHER NOTICE that the witness shall bring with him
4 to the deposition and produce no later than 9:00 a.m. on the day of the deposition
5 all original documents identified in Schedule "A" attached to this notice.
6

7 Dated: December 28, 2007 CONDON & FORSYTH LLP
8

9 By: 

10 MARSHALL S. TURNER (*pro hac vice*)
11 SCOTT D. CUNNINGHAM
12

13 Attorneys for Plaintiff and Counter-Defendant
14 ALL NIPPON AIRWAYS COMPANY, LTD.
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1 to or during taxi; (ii) clearing potential conflicts with other aircraft prior to or during
2 pushback; (iii) conflict resolution; (iv) wing growth; (v) aircraft taxiing; and (vi)
3 determination of Pilot Flying.

4 6. Any and all DOCUMENTS reflecting UAL's policies, procedures, and
5 operations in effect on October 7, 2003 concerning (i) clearing potential conflicts
6 with other aircraft prior to or during taxi; (ii) clearing potential conflicts with other
7 aircraft prior to or during pushback; (iii) conflict resolution; (iv) wing growth; (v)
8 aircraft taxiing; and (vi) determination of Pilot Flying.

9 7. Any and all DOCUMENTS reflecting UAL's policies, procedures, and
10 operations currently in effect concerning (i) clearing potential conflicts with other
11 aircraft prior to or during taxi; (ii) clearing potential conflicts with other aircraft prior
12 to or during pushback; (iii) conflict resolution; (iv) wing growth; (v) aircraft taxiing;
13 and (vi) determination of Pilot Flying.

14 8. A complete copy of the UAL operations manual in effect on October 7,
15 2003 and applicable to the UAL aircraft involved in the collision between ANA
16 Flight NH007 and UAL Flight UA809 at San Francisco International Airport
17 ("SFO") on October 7, 2003 (the "Accident").

18 9. A complete copy of the current UAL operations manual applicable to its
19 B777 aircraft at the present time.

20 10. Any and all DOCUMENTS which UAL and/or its flight crew was
21 required to have on board Flight UA809 at the time of the Accident.

22 11. Any and all DOCUMENTS regarding pushback and taxi operations of
23 UAL B777 aircraft into and out of SFO in effect at the time of the Accident.

24 12. Any and all DOCUMENTS regarding pushback and taxi operations of
25 UAL B777 aircraft into and out of SFO in effect at the present time.

26 13. Any and all DOCUMENTS reflecting the requested and/or assigned
27 routing for Flight UA809 on October 7, 2003.
28

1 14. A complete copy of all Jeppesen charts applicable to ground operations
2 of UAL B777 aircraft at SFO in effect at the time of the Accident.

3 15. A complete copy of all Jeppesen charts applicable to ground operations
4 of UAL B777 aircraft at SFO in effect at present.

5 16. A complete copy of all charts applicable to ground operations of Flight
6 UA809 at SFO in effect at the time of the Accident.

7 17. Any and all DOCUMENTS reflecting dispatch for Flight UA809 on
8 October 7, 2003, including but not limited to (i) flight plan; and (ii) assigned altitude.

9 18. Any and all DOCUMENTS reflecting procedures used during the
10 pushback operation of Flight UA809 on October 7, 2003.

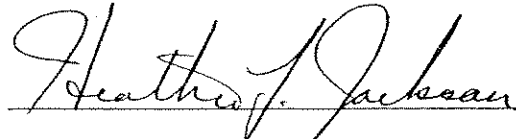
11 19. Any and all DOCUMENTS reflecting changes in procedures used
12 during pushback operations of UAL B777 aircraft after October 7, 2003.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing **PLAINTIFF ALL NIPPON AIRWAYS SECOND AMENDED NOTICE OF DEPOSITION OF JOHN REDIGER** was mailed this 28th day of December, 2007, to:

Scott R. Torpey, Esq. Jaffe, Raitt, Heuer & Weiss 2777 Franklin Road, Suite 2500 Southfield, MI 48034-8214 Phone: (248) 727-1461 Fax: (248) 351-3082	Attorneys for defendant
Jeffrey A. Worthe, Esq. Worthe, Hanson & Worthe The Xerox Centre 1851 East First Street, Ninth Floor Santa Ana, CA 92705	Attorneys for defendant

in a properly addressed wrapper in an official depository under the exclusive care and custody of the United States Post Office Department within the State of New York.


HEATHER L. JACKSON

Sworn to before me this
 28th day of December, 2007


 Notary Public

Timothy H Eskridge
 Notary Public State of N.Y.
 02ES6121835
 Qualified in New York County
 Commission Expires January 31 2009

1 Scott D. Cunningham (State Bar No.: 200413)
CONDON & FORSYTH LLP
2 1901 Avenue of the Stars, Suite 850
Los Angeles, California 90067-6010
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Facsimile: (310) 557-1299
4 Email: scunningham@condonlaw.com

5 -and-

6 Marshall S. Turner (*pro hac vice*)
CONDON & FORSYTH LLP
7 7 Times Square
New York, NY 10036
8 Telephone: (212) 490-9100
Facsimile: (212) 370-4453
9 Email: mturner@condonlaw.com

10 Attorneys for Plaintiff and Counter-Defendant
ALL NIPPON AIRWAYS COMPANY, LTD.

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA

14 ALL NIPPON AIRWAYS COMPANY,)
LTD.,)
15 Plaintiff,)
16 vs.)
17 UNITED AIR LINES, INC.,)
18 Defendant.)

Case No.: C07-03422 EDL

**SECOND AMENDED
NOTICE OF DEPOSITION OF
BRAD POWELL**

19 AND RELATED COUNTERCLAIM
20

21 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD IN THIS
22 ACTION:

23 YOU ARE HEREBY NOTIFIED THAT pursuant to Federal Rule of Civil
24 Procedure 30, All Nippon Airways Company, Ltd. ("ANA"), by its attorneys
25 Condon & Forsyth LLP, will take the deposition of Brad Powell at Combs
26 Reporting, Inc., 595 Market Street, Suite 620, San Francisco, California 94105, on
27 January 25, 2008, commencing at 9:30 a.m.

28 ANA may record the testimony by videotape, in addition to recording the

1 testimony by stenographic method. ANA reserves the right to use the videotaped
2 deposition of Brad Powell at trial.

3 PLEASE TAKE FURTHER NOTICE that the witness shall bring with him
4 to the deposition and produce no later than 9:00 a.m. on the day of the deposition
5 all original documents identified in Schedule "A" attached to this notice.
6

7 Dated: December 28, 2007 CONDON & FORSYTH LLP

8
9 By: 

10 MARSHALL S. TURNER (*pro hac vice*)

11 SCOTT D. CUNNINGHAM

12 Attorneys for Plaintiff and Counter-Defendant
13 ALL NIPPON AIRWAYS COMPANY, LTD.
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SCHEDULE "A"

The term "DOCUMENTS" as used herein means writings of every kind and character including correspondence, transcripts, summaries, notes, letters, memoranda, opinions, reports, tabulations, statements, photographs, drawings, charts, graphs, models, information stored in or generated by computer programs, bulletins, books, schedules, compilations, lists, worksheets, records of any communications, conversations or conferences, telegrams, appointment books, calendars, diaries, audio or video tape recordings, manuals, ledgers and journals. It is requested that all such documents be brought with the deponent, whether or not the deponent or any party will claim that any such document is protected from discovery by the attorney/client privilege or work product rule. The use of the term "DOCUMENTS" includes the original of such writings and any copies which bear notations or information in addition to that contained in the original. A DOCUMENT is deemed to be in custody or control of the witness if such witness has a right to secure the DOCUMENT or a copy thereof from any person or any public or private entity having actual physical possession thereof.

DOCUMENTS TO BE PRODUCED

1. The entire contents of the deponent's file concerning the subject accident which took place on October 7, 2003 at San Francisco International Airport.

2. Any and all DOCUMENTS regarding the subject flight and accident and the investigation thereof.

3. The deponent's personnel records, including but not limited to DOCUMENTS pertaining to any aircraft accident or incident involving the deponent and any disciplinary action against the deponent.

4. The deponent's licenses, certificates, and other DOCUMENTS related to the deponent's operation of aircraft or aircraft components.

5. The deponent's training materials and records, including but not limited to DOCUMENTS concerning (i) clearing potential conflicts with other aircraft prior

1 to or during taxi; (ii) clearing potential conflicts with other aircraft prior to or during
2 pushback; (iii) conflict resolution; (iv) wing growth; (v) aircraft taxiing; and (vi)
3 determination of Pilot Flying.

4 6. Any and all DOCUMENTS reflecting UAL's policies, procedures, and
5 operations in effect on October 7, 2003 concerning (i) clearing potential conflicts
6 with other aircraft prior to or during taxi; (ii) clearing potential conflicts with other
7 aircraft prior to or during pushback; (iii) conflict resolution; (iv) wing growth; (v)
8 aircraft taxiing; and (vi) determination of Pilot Flying.

9 7. Any and all DOCUMENTS reflecting UAL's policies, procedures, and
10 operations currently in effect concerning (i) clearing potential conflicts with other
11 aircraft prior to or during taxi; (ii) clearing potential conflicts with other aircraft prior
12 to or during pushback; (iii) conflict resolution; (iv) wing growth; (v) aircraft taxiing;
13 and (vi) determination of Pilot Flying.

14 8. A complete copy of the UAL operations manual in effect on October 7,
15 2003 and applicable to the UAL aircraft involved in the collision between ANA
16 Flight NH007 and UAL Flight UA809 at San Francisco International Airport
17 ("SFO") on October 7, 2003 (the "Accident").

18 9. A complete copy of the current UAL operations manual applicable to its
19 B777 aircraft at the present time.

20 10. Any and all DOCUMENTS which UAL and/or its flight crew was
21 required to have on board Flight UA809 at the time of the Accident.

22 11. Any and all DOCUMENTS regarding pushback and taxi operations of
23 UAL B777 aircraft into and out of SFO in effect at the time of the Accident.

24 12. Any and all DOCUMENTS regarding pushback and taxi operations of
25 UAL B777 aircraft into and out of SFO in effect at the present time.

26 13. Any and all DOCUMENTS reflecting the requested and/or assigned
27 routing for Flight UA809 on October 7, 2003.

1 14. A complete copy of all Jeppesen charts applicable to ground operations
2 of UAL B777 aircraft at SFO in effect at the time of the Accident.

3 15. A complete copy of all Jeppesen charts applicable to ground operations
4 of UAL B777 aircraft at SFO in effect at present.

5 16. A complete copy of all charts applicable to ground operations of Flight
6 UA809 at SFO in effect at the time of the Accident.

7 17. Any and all DOCUMENTS reflecting dispatch for Flight UA809 on
8 October 7, 2003, including but not limited to (i) flight plan; and (ii) assigned altitude.

9 18. Any and all DOCUMENTS reflecting procedures used during the
10 pushback operation of Flight UA809 on October 7, 2003.

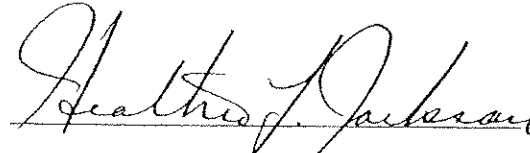
11 19. Any and all DOCUMENTS reflecting changes in procedures used
12 during pushback operations of UAL B777 aircraft after October 7, 2003.

CERTIFICATE OF SERVICE

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Scott R. Torpey, Esq. Jaffe, Raitt, Heuer & Weiss 2777 Franklin Road, Suite 2500 Southfield, MI 48034-8214 Phone: (248) 727-1461 Fax: (248) 351-3082	Attorneys for defendant
Jeffrey A. Worthe, Esq. Worthe, Hanson & Worthe The Xerox Centre 1851 East First Street, Ninth Floor Santa Ana, CA 92705	Attorneys for defendant

in a properly addressed wrapper in an official depository under the exclusive care and custody of the United States Post Office Department within the State of New York.


HEATHER L. JACKSON

Sworn to before me this
 28th day of December, 2007


 Notary Public

Timothy H Eskridge
 Notary Public State of N.Y.
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 Qualified in New York County
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6 Marshall S. Turner (*pro hac vice*)
CONDON & FORSYTH LLP
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Facsimile: (212) 370-4453
9 Email: mturner@condonlaw.com

10 Attorneys for Plaintiff and Counter-Defendant
ALL NIPPON AIRWAYS COMPANY, LTD.
11

12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA

14 ALL NIPPON AIRWAYS COMPANY,) LTD.,
15 Plaintiff,

16 vs.

17 UNITED AIR LINES, INC.,
18 Defendant.

Case No.: C07-03422 EDL

**THIRD AMENDED
NOTICE OF DEPOSITION OF
EDWARD LOH**

19 AND RELATED COUNTERCLAIM
20

21 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD IN THIS
22 ACTION:

23 YOU ARE HEREBY NOTIFIED THAT pursuant to Federal Rule of Civil
24 Procedure 30, All Nippon Airways Company, Ltd. ("ANA"), by its attorneys
25 Condon & Forsyth LLP, will take the deposition of Edward Loh at Combs
26 Reporting, Inc., 595 Market Street, Suite 620, San Francisco, California 94105, on
27 January 18, 2008, commencing at 9:30 a.m.

28 ANA may record the testimony by videotape, in addition to recording the

1 testimony by stenographic method. ANA reserves the right to use the videotaped
2 deposition of Edward Loh at trial.

3 PLEASE TAKE FURTHER NOTICE that the witness shall bring with him
4 to the deposition and produce no later than 9:00 a.m. on the day of the deposition
5 all original documents identified in Schedule "A" attached to this notice.
6

7 Dated: December 28, 2007 CONDON & FORSYTH LLP

8
9 By: 
10 MARSHALL S. TURNER (*pro hac vice*)
11 SCOTT D. CUNNINGHAM

12 Attorneys for Plaintiff and Counter-Defendant
13 ALL NIPPON AIRWAYS COMPANY, LTD.
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1 **SCHEDULE "A"**

2 The term "DOCUMENTS" as used herein means writings of every kind and
3 character including correspondence, transcripts, summaries, notes, letters,
4 memoranda, opinions, reports, tabulations, statements, photographs, drawings, charts,
5 graphs, models, information stored in or generated by computer programs, bulletins,
6 books, schedules, compilations, lists, worksheets, records of any communications,
7 conversations or conferences, telegrams, appointment books, calendars, diaries, audio
8 or video tape recordings, manuals, ledgers and journals. It is requested that all such
9 documents be brought with the deponent, whether or not the deponent or any party
10 will claim that any such document is protected from discovery by the attorney/client
11 privilege or work product rule. The use of the term "DOCUMENTS" includes the
12 original of such writings and any copies which bear notations or information in
13 addition to that contained in the original. A DOCUMENT is deemed to be in
14 custody or control of the witness if such witness has a right to secure the
15 DOCUMENT or a copy thereof from any person or any public or private entity
16 having actual physical possession thereof.

17 **DOCUMENTS TO BE PRODUCED**

18 1. The entire contents of the deponent's file concerning the subject
19 accident which took place on October 7, 2003 at San Francisco International Airport
20 (the "Accident").

21 2. Any and all DOCUMENTS regarding the Accident and the
22 investigation thereof.

23 3. The deponent's personnel records, including but not limited to
24 DOCUMENTS pertaining to any accident or incident involving the deponent and any
25 disciplinary action against the deponent.

26 4. Any and all DOCUMENTS regarding training materials and records for
27 the deponent, including but not limited to those DOCUMENTS regarding the
28 training of deponent for his position as Ramp Tower G Ramp Controller at San

1 Francisco International Airport ("SFO") in effect on or before October 7, 2003.

2 5. Any and all DOCUMENTS concerning the deponent's position as
3 Ramp Tower G Ramp Controller at SFO in effect on October 7, 2003 regarding (i)
4 communications with aircraft; (ii) clearances and instructions for pushback and taxi;
5 (iii) traffic advisories and safety alerts; (iv) maintaining separation of aircraft in the
6 vicinity of Terminal G; (v) ensuring that no collisions occur between aircraft; (vi)
7 organizing and expediting the flow of traffic; (vii) paying attention to all aircraft and
8 not focusing on one area to the exclusion of another; (viii) clearing potential conflicts
9 between aircraft prior to or during taxi; (ix) clearing potential conflicts between
10 aircraft prior to or during pushback; and (x) conflict resolution.

11 6. Any and all DOCUMENTS concerning the deponent's position as
12 Ramp Tower G Ramp Controller at SFO currently in effect regarding (i)
13 communications with aircraft; (ii) clearances and instructions for pushback and taxi;
14 (iii) traffic advisories and safety alerts; (iv) maintaining separation of aircraft in the
15 vicinity of Terminal G; (v) ensuring that no collisions occur between aircraft; (vi)
16 organizing and expediting the flow of traffic; (vii) paying attention to all aircraft and
17 not focusing on one area to the exclusion of another; (viii) clearing potential conflicts
18 between aircraft prior to or during taxi; (ix) clearing potential conflicts between
19 aircraft prior to or during pushback; and (x) conflict resolution.

20 7. Any and all materials and records concerning the training of deponent
21 for his position as Ramp Tower G Ramp Controller at SFO received on or before
22 October 7, 2003 from (i) UAL; (ii) the Federal Aviation Authority ("FAA"); and (iii)
23 San Francisco Terminal Equipment Co. ("SFOTEC").

24 8. Any and all DOCUMENTS concerning the certification of the
25 deponent, including but not limited to those DOCUMENTS regarding the deponent's
26 position as Ramp Tower G Ramp Controller at SFO.

27 9. A complete copy of all procedures and policies concerning the
28

1 deponent's position as Ramp Tower G Ramp Controller at SFO in effect on October
2 7, 2003.

3 10. A complete copy of all changes to procedures and policies concerning
4 deponent's position as Ramp Tower G Ramp Controller at SFO from October 7,
5 2003 to present.

6 11. A complete copy of all procedures and policies concerning the operation
7 of Ramp Tower G at SFO in effect on October 7, 2003, including but not limited to
8 documents concerning (i) clearing potential conflicts between aircraft prior to or
9 during taxi; (ii) clearing potential conflicts between aircraft prior to or during
10 pushback; (iii) conflict resolution; (iv) taxiing; and (v) procedures prior to, during,
11 and after issuance of clearance to push, clearance to taxi, and clearance to Spot 10
12 instructions.

13 12. A complete copy of all procedures and policies concerning the operation
14 of Ramp Tower G at SFO from October 7, 2003 to present, including but not limited
15 to documents concerning (i) clearing potential conflicts between aircraft prior to or
16 during taxi; (ii) clearing potential conflicts between aircraft prior to or during
17 pushback; (iii) conflict resolution; (iv) taxiing; and (v) procedures prior to, during,
18 and after issuance of clearance to push, clearance to taxi, and clearance to Spot 10
19 instructions.

20 13. A complete copy of all changes to procedures and policies concerning
21 the operation of Ramp Tower G at SFO from October 7, 2003 to present.

22 14. The results and/or records of the urine sample testing conducted on the
23 deponent in connection with the Accident.

24 15. The results and/or records of all checks and tests conducted on the
25 deponent for fitness for duty at the time of the Accident.

26 16. The results and/or records of any physical or psychological
27 examination conducted on the deponent in connection with the Accident.
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1 17. A complete copy of the Memorandum of Understanding between
2 UAL and SFOTEC in effect on October 7, 2003.


3 18. A complete copy of UAL's "G Tower Procedures" manual.
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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing **PLAINTIFF ALL NIPPON AIRWAYS THIRD AMENDED NOTICE OF DEPOSITION OF EDWARD LOH** was mailed this 28th day of December, 2007, to:

Scott R. Torpey, Esq. Jaffe, Raitt, Heuer & Weiss 2777 Franklin Road, Suite 2500 Southfield, MI 48034-8214 Phone: (248) 727-1461 Fax: (248) 351-3082	Attorneys for defendant
Jeffrey A. Worthe, Esq. Worthe, Hanson & Worthe The Xerox Centre 1851 East First Street, Ninth Floor Santa Ana, CA 92705	Attorneys for defendant

in a properly addressed wrapper in an official depository under the exclusive care and custody of the United States Post Office Department within the State of New York.


HEATHER L. JACKSON

Sworn to before me this
 28th day of December, 2007


 Notary Public

Timothy H Eskridge
Notary Public State of N.Y.
02ES6121835
Qualified in New York County
Commission Expires January 31 2009

1 Scott D. Cunningham (State Bar No.: 200413)
CONDON & FORSYTH LLP
2 1901 Avenue of the Stars, Suite 850
Los Angeles, California 90067-6010
3 Telephone: (310) 557-2030
Facsimile: (310) 557-1299
4 Email: scunningham@condonlaw.com

5 -and-

6 Marshall S. Turner (*pro hac vice*)
CONDON & FORSYTH LLP
7 7 Times Square
New York, NY 10036
8 Telephone: (212) 490-9100
Facsimile: (212) 370-4453
9 Email: mturner@condonlaw.com

10 Attorneys for Plaintiff and Counter-Defendant
ALL NIPPON AIRWAYS COMPANY, LTD.

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA

14 ALL NIPPON AIRWAYS COMPANY,)
LTD.,)
15 Plaintiff,)
16 vs.)
17 UNITED AIR LINES, INC.,)
18 Defendant.)

Case No.: C07-03422 EDL

**THIRD AMENDED
NOTICE OF DEPOSITION OF
JULIO HERNANDEZ**

19 AND RELATED COUNTERCLAIM
20

21 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD IN THIS
22 ACTION:

23 YOU ARE HEREBY NOTIFIED THAT pursuant to Federal Rule of Civil
24 Procedure 30, All Nippon Airways Company, Ltd. ("ANA"), by its attorneys
25 Condon & Forsyth LLP, will take the deposition of Julio Hernandez at Combs
26 Reporting, Inc., 595 Market Street, Suite 620, San Francisco, California 94105, on
27 January 17, 2008, commencing at 9:30 a.m.

28 ANA may record the testimony by videotape, in addition to recording the

1 testimony by stenographic method. ANA reserves the right to use the videotaped
2 deposition of Julio Hernandez at trial.

3 PLEASE TAKE FURTHER NOTICE that the witness shall bring with him
4 to the deposition and produce no later than 9:00 a.m. on the day of the deposition
5 all original documents identified in Schedule "A" attached to this notice.
6

7 Dated: December 28, 2007

CONDON & FORSYTH LLP

8
9 By: 

10 MARSHALL S. TURNER (*pro hac vice*)
11 SCOTT D. CUNNINGHAM

12 Attorneys for Plaintiff and Counter-Defendant
13 ALL NIPPON AIRWAYS COMPANY, LTD.
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1901 Avenue of the Stars, Suite 850
Los Angeles, California 90067-5019
Telephone: (310) 557-2030

SCHEDULE "A"

The term "DOCUMENTS" as used herein means writings of every kind and character including correspondence, transcripts, summaries, notes, letters, memoranda, opinions, reports, tabulations, statements, photographs, drawings, charts, graphs, models, information stored in or generated by computer programs, bulletins, books, schedules, compilations, lists, worksheets, records of any communications, conversations or conferences, telegrams, appointment books, calendars, diaries, audio or video tape recordings, manuals, ledgers and journals. It is requested that all such documents be brought with the deponent, whether or not the deponent or any party will claim that any such document is protected from discovery by the attorney/client privilege or work product rule. The use of the term "DOCUMENTS" includes the original of such writings and any copies which bear notations or information in addition to that contained in the original. A DOCUMENT is deemed to be in custody or control of the witness if such witness has a right to secure the DOCUMENT or a copy thereof from any person or any public or private entity having actual physical possession thereof.

DOCUMENTS TO BE PRODUCED

1. The entire contents of the deponent's file concerning the subject accident which took place on October 7, 2003 at San Francisco International Airport (hereinafter the "Accident").

2. Any and all DOCUMENTS regarding the subject flight and accident and the investigation thereof.

3. The deponent's training and personnel records to date, including but not limited to DOCUMENTS pertaining to any accident or incident involving the deponent and any disciplinary action against the deponent.

4. The deponent's licenses, certificates, and other DOCUMENTS related to the deponent's operation of pushback tug/tractor.

5. The deponent's training materials and records, including but not limited

1 to DOCUMENTS concerning (i) pushback procedures; (ii) responsibility for safe
2 dispatch and clearance; (iii) determination of number and position of wing walkers
3 during pushback; (iv) maintaining safety clearance for aircraft movement; (v)
4 stopping pushback when there is a question about clearance; (vi) clearing potential
5 conflicts with other aircraft prior to or during pushback; (vii) conflict resolution; and
6 (viii) wing growth.

7 6. Any and all DOCUMENTS reflecting UAL's policies, procedures, and
8 operations in effect on October 7, 2003 concerning (i) pushback procedures; (ii)
9 responsibility for safe dispatch and clearance; (iii) determination of number and
10 position of wing walkers during pushback; (iv) maintaining safety clearance for
11 aircraft movement; (v) stopping pushback when there is a question about clearance;
12 (vi) clearing potential conflicts with other aircraft prior to or during pushback; (vii)
13 conflict resolution; and (viii) wing growth.

14 7. Any and all DOCUMENTS reflecting UAL's policies, procedures, and
15 operations currently in effect concerning (i) pushback procedures; (ii) responsibility
16 for safe dispatch and clearance; (iii) determination of number and position of wing
17 walkers during pushback; (iv) maintaining safety clearance for aircraft movement;
18 (v) stopping pushback when there is a question about clearance; (vi) clearing
19 potential conflicts with other aircraft prior to or during pushback; (vii) conflict
20 resolution; and (viii) wing growth.

21 8. A complete copy of the UAL operations manual in effect on October 7,
22 2003 and applicable to the UAL aircraft involved in the Accident.

23 9. A complete copy of the current UAL operations manual applicable to its
24 B777 aircraft.

25 10. Any and all DOCUMENTS regarding pushback and taxi operations of
26 UAL B777 aircraft into and out of SFO in effect at the time of the Accident.

27 11. Any and all DOCUMENTS regarding pushback and taxi operations of
28

1 UAL B777 aircraft into and out of SFO in effect at the present time.

2 12. Any and all DOCUMENTS reflecting changes in pushback and taxi
3 operations of UAL B777 aircraft after October 7, 2003.

4 13. The results and/or records of all checks and tests conducted on the
5 deponent for fitness for duty at the time of the Accident.

6 14. A complete copy of the UAL "Ramp Services Trainer Aircraft
7 Guideperson & Wingwalker Participant Guide" in effect on October 7, 2003.

8 15. A complete copy of "United Airlines Maintenance Manual" sections
9 applicable to (i) ramp services; (ii) aircraft guidepersons; (iii) wingwalkers; (iv)
10 pushback; (v) aircraft dispatch process; (vi) tractor drivers; and (vii) marshalls.

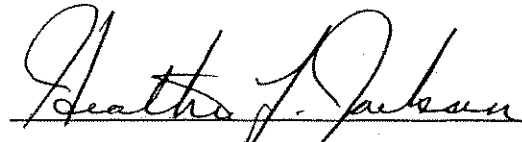
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1901 Avenue of the Stars, Suite 850
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Telephone: (310) 557-2030

CERTIFICATE OF SERVICE


The undersigned certifies that a copy of the foregoing **PLAINTIFF ALL NIPPON AIRWAYS THIRD AMENDED NOTICE OF DEPOSITION OF JULIO HERNANDEZ** was mailed this 28th day of December, 2007, to:

Scott R. Torpey, Esq. Jaffe, Raitt, Heuer & Weiss 2777 Franklin Road, Suite 2500 Southfield, MI 48034-8214 Phone: (248) 727-1461 Fax: (248) 351-3082	Attorneys for defendant
Jeffrey A. Worthe, Esq. Worthe, Hanson & Worthe The Xerox Centre 1851 East First Street, Ninth Floor Santa Ana, CA 92705	Attorneys for defendant

in a properly addressed wrapper in an official depository under the exclusive care and custody of the United States Post Office Department within the State of New York.


HEATHER L. JACKSON

Sworn to before me this
 28th day of December, 2007


 Notary Public

Timothy H Eskridge
 Notary Public State of N.Y.
 02ES6121835
 Qualified in New York County
 Commission Expires January 31 2009